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 Counsel to the Firm

PLEASE REPLY TO:  
 New York City Office

*all parties concerned will be  
 heard regarding the settlement  
 and fees after the petition  
 is filed. So as - June 5, 2012  
 dated.*

*MJ  
 6/5/12*

Chambers,  
 Hon. Lawrence M. McKenna  
 United States District Judge  
 United States Courthouse  
 500 Pearl Street, Room 1640  
 New York, NY 10007

RE: In the Matter of the Complaint of ANDREW HARNETT, as owner of vessel M/V READY JET GO  
 U.S.D.C.S.D.N.Y.: 06-699 (LMM)

In the Matter of Peter J. Sharp Boathouse, Inc., as owner of the floating vessel  
 constituting the boat house, seeking exoneration from or limitation of liability  
 U.S.D.C.S.D.N.Y.: 06 Civ. 3061 (LMM)

In the Matter of New York Rowing Association, Inc., as owner of a 2001, coxless  
 Empacher rowing shell, seeking exoneration from or limitation of liability  
 U.S.D.C.S.D.N.Y.: 06 Civ. 3062 (LMM) and a related case.

Honorable Sir:

This firm represented Nina Rundorf and Lee Rundorf as co-Executors of the Estate of Jim H. Rundorf, deceased, as claimants in the above matters. We were substituted as claimants' counsel by the law firm of Napoli Bern Ripka, LLP.

We have recently been advised that a settlement has been reached with all parties and that a compromise petition will be submitted to the Court for the purpose of approving the settlement.

My purpose in writing is to notify the Court that while we have no objection to an allocation for the purpose of a distribution to the decedent's estate and his distributees, that we respectfully request the opportunity to be heard regarding any allocation of the settlement for attorney's fees.

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As the attorneys who initially filed the claims in the above matter, this firm has a lien for its attorney's fees pursuant to §475 of the Judiciary Law of the State of New York <sup>1</sup>.

Accordingly, we would appreciate the opportunity to provide the Court with an accounting of the work done by this firm at the time it entertains the compromise petition.

Thank you.

Respectfully submitted,

SULLIVAN PAPAIN BLOCK  
McGRATH & CANNANO P.C.

By:

  
FRANK V. FLORIANI (FF4489)

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(063618)  
cc:

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<sup>1</sup> "From the commencement of an action, special or other proceeding in any court or before any state, municipal or federal department, except a department of labor, or the service of an answer containing a counterclaim, the attorney who appears for a party has a lien upon his client's cause of action, claim or counterclaim, which attaches to a verdict, report, determination, decision, judgment or final order in his client's favor, and the proceeds thereof in whatever hands they may come; and the lien cannot be affected by any settlement between the parties before or after judgment, final order or determination. The court upon the petition of the client or attorney may determine and enforce the lien."

N.Y. Judiciary Law § 475 (McKinney)